



STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.  
EXECUTIVE DIRECTOR

September 1, 1993

CERTIFIED MAIL NO. P 167 722 232

Ms. Rhonda York  
Randall-Extron  
Highway 332 East  
Grenada, Mississippi 38901

Re: Compliance Evaluation Inspection  
Randall-Extron  
Grenada, MS

Dear Ms. York:

Enclosed please find an inspection report and checklist that were completed as a result of a Compliance Evaluation Inspection at Randall-Extron on July 28, 1993. This inspection revealed the following apparent violation(s) of the Mississippi Hazardous Waste Management Regulations (MHWMR):

1. MHWMR 265.14(c): Warning signs were not posted around the facility's hazardous waste surface impoundment.

We request that you respond to these apparent violation(s) within 10 days of receipt of this letter. This response should contain: (1) actions that have been taken to correct the violation(s), (2) schedule for correcting the violation(s), or (3) reasons that you believe the alleged violation(s) did not exist. The Office of Pollution Control will review this information before determining if further action including a penalty is warranted. Section 17-17-29 of the Mississippi Code Annotated (Supp. 1991) allows assessments of penalties not more than \$25,000 per day per violation. Failure to submit this information may result in enforcement action.

If you have any questions, do not hesitate to contact me at (601) 961-5171.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bruce Ferguson", with a long horizontal flourish extending to the right.

Bruce Ferguson  
Hazardous Waste Division

BF:gd

Enclosures

cc: Mr. G. Alan Farmer, EPA (w/enclosures)  
OFFICE OF POLLUTION CONTROL, P. O. BOX 138, JACKSON, MS 39289-0385, (601) 961-5171

## RCRA COMPLIANCE EVALUATION INSPECTION

### 1. INSPECTOR AND AUTHOR OF REPORT

Bruce Ferguson, ESIII  
Department of Environmental Quality

### 2. FACILITY INFORMATION

Randall-Textron  
Highway 332 East  
Grenada, Mississippi 38901  
MSD007037278

### 3. RESPONSIBLE COMPANY OFFICIAL

Frank Logan, Plant Manager

### 4. INSPECTION PARTICIPANTS

Rhonda York, Randall-Textron  
Dann Spariousa, U.S. EPA  
Bruce Ferguson, MDEQ

### 5. DATE AND TIME OF INSPECTION

July 28, 1993  
9:00 a.m.

### 6. APPLICABLE REGULATIONS

Mississippi Hazardous Waste Management Regulations (MHWMR)  
Parts 262, 265 and 268.

### 7. PURPOSE OF INSPECTION

A Compliance Evaluation Inspection was performed to determine Randall-Textron's compliance status with the applicable regulations.

### 8. FACILITY DESCRIPTION

The facility was built in 1960 by Lyons, Inc. North American Rockwell purchased the facility in 1966 and Randall-Textron purchased the facility in 1985.

Randall-Textron manufactures wheel covers for the automobile industry. Manufacturing activities include parts stamping, rolling, washing, polishing, electroplating and painting.

The electroplating process generates D007 characteristic hazardous wastes, bottom sediment and rinsate waters. The wastewater was previously sent to a chrome reduction unit and then to a settling basin which was part of the facility's

wastewater treatment system. The sediment in the settling basin was determined to meet the F006 hazardous waste listing, wastewater treatment sludges from electroplating operations. The settling basin is currently undergoing closure and its use has been discontinued.

Rinsate waters are currently recycled. The spillage or overflow of the rinsate waters goes to a "destruct pit" for storage until a predetermined amount has been collected. The waters are then pumped to a recovery unit inside the plant which distills the water and concentrates the chrome. The chrome is then returned to the chrome tanks within the process.

The painting operation generates D007 characteristic waste, air filters from the paint booths. The process previously generated waste TCE which met the F002 listing and the characteristic listing D040. The process has been changed and TCE was replaced with tri-sodium phosphate and sodium metasilicate.

The facility previously generated D001 characteristic waste, Safety Kleen petroleum naptha, in parts washers. The petroleum naptha has been replaced with Non-Haz, a mineral spirits which does not meet the D001 listing.

## **9. FINDINGS**

The records inspected included manifests, land ban notifications, personnel training records, contingency plan and waste analysis. All records were found to be in order. Financial assurance documentation is provided to the Office and was reviewed and found to be in order.

After reviewing the records the surface impoundment was inspected. Signs were not posted around the impoundment identifying it as a hazard according to MHWMR 265.14(c).

There are currently three areas where hazardous wastes are generated at the facility; the electroplating process generates rinsate waters and tank bottoms which are D007 characteristic wastes; the painting process generates air filters which are D007 characteristic because of the proximity to the electroplating process; and a rack stripping process which generates waste methylene chloride a F002 listed waste. The areas of waste generation were viewed, however, on the day of the inspection the plant was shut down for inventory and none of the processes were in operation.

The less than ninety day storage area was inspected and found to be in good condition. The storage area exceeds the requirements for less than ninety day storage. The area is bermed, fenced and locked, and is provided with a roof to prevent the collection of rainwater. On the day of the

inspection five drums were being stored. These drums consisted of one drum of D007 chrome sludge, one drum of D001 waste urethane, two drums of D001 waste toluene and one drum of D007 paint air filters. All the drums were properly labeled and contained accumulation dates. All drums were within the ninety day time frame for storage.

Inspection forms for the less than ninety day storage area were reviewed and found to be in order. The area is inspected on a daily basis when the plant is in operation. The area is not inspected on weekends nor during plant shutdowns.

#### 10. CONCLUSIONS

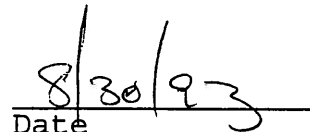
The following apparent violations of the Mississippi Hazardous Waste Management Regulations were found:


- 1) MHWMR 265.14(c) - "... a sign with the legend, "Danger - Unauthorized Personnel Keep Out," must be posted at each entrance to the active portion of a facility, and at other locations, in sufficient numbers to be seen from any approach to this active portion..." The surface impoundment which is undergoing closure did not have these signs posted.

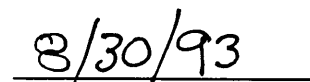
It appears that the process which reclaims the chrome from the rinsate waters is operating under the exclusion stated in MHWMR 261.4(a)(8). Under this exclusion materials are never to be accumulated for more than twelve months without being reclaimed. A tracking system should be established to show that this condition is met.

#### 11. SIGNED

  
Bruce Ferguson, Inspector

  
Date

  
David Peacock, Supervisor

  
Date

Part 1

General Site Information

Facility Name: RANDALL TETRON  
Address: \_\_\_\_\_  
\_\_\_\_\_  
I.D. Number: MSD007037278  
Contact: RANDALL YERK  
Title: Chemist  
Phone Number: \_\_\_\_\_

Type of Ownership:

\_\_\_ Federal \_\_\_ State \_\_\_ County \_\_\_ Municipal X Private

Facility Status:

X Generator \_\_\_ Transporter \_\_\_ Treatment \_\_\_ Storage X Disposal

Regulatory Status:

X Interim Status \_\_\_ Part B Submitted  
\_\_\_ Permitted \_\_\_ Part B in Preparation

Principal Inspector Name: FRANK FERRELL Title: Env. Sci. III  
Organization: \_\_\_\_\_ Phone Number: \_\_\_\_\_

Inspection Participants:

<u>Name</u>	<u>Title</u>	<u>Representing</u>
<u>RANDALL YERK</u>	<u>Plant Chemist</u>	<u>Randall Tetron</u>
<u>DANN SPANGLER</u>		<u>USEPA</u>
<u>FRANK FERRELL</u>	<u>ES III</u>	<u>MDA</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Part \_\_\_\_

GENERAL FACILITY CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? ☒ Yes ☐ No ☐ NA

a. If yes, EPA I.D. No. 11 8 D 0 0 7 0 3 7 2 7 8  
If no, explain. \_\_\_\_\_

2. Has facility received hazardous waste from a foreign source? ☐ Yes ☒ No ☐ NA

a. If yes, has it filed a notice with the Regional Administrator? ☐ Yes ☐ No ☒ NA

Waste Analysis

3. Does facility maintain a copy of the waste analysis plan at the facility? ☐ Yes ☐ No ☐ NA

a. If yes, does it include: (264.13) (265.13)

1. Parameters for which each waste will be analyzed? ☐ Yes ☐ No ☐ NA

2. Test methods used to test for these parameters? ☐ Yes ☐ No ☐ NA

3. Sampling method used to obtain sample? ☐ Yes ☐ No ☐ NA

4. Frequency with which the initial analyses will be reviewed or repeated? ☐ Yes ☐ No ☐ NA

5. (For offsite facilities) waste analyses that generators have agreed to supply? ☐ Yes ☐ No ☒ NA

6. (For offsite facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including:

a. Procedures to be used to determine the identity of each movement of waste. ☐ Yes ☐ No ☒ NA

b. Sampling method to be used to obtain representative sample of the waste to be identified. ☐ Yes ☐ No ☒ NA

4. Does the facility provide adequate security through: (264.14) (265.14)

a. 24-hour surveillance system (e.g., television monitoring or guards)? ☒ Yes ☐ No ☐ NA

OR

- b. 1. Artificial or natural barrier around facility (e.g., fence or fence and cliff)? ☒ Yes ☐ No ☐ NA

Describe Fence

AND

2. Means to control entry through entrances (e.g., attendant, television monitors, locked entrance, controlled roadway access)? ☐ Yes ☐ No ☐ NA

Describe Guard

General Inspection Requirements (264.15) (265.15)

5. Does the owner/operator maintain a written schedule at the facility for inspecting:

- |  |  |
|--|--|
| a. Monitoring equipment?               | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| b. Safety and emergency equipment?     | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| c. Security devices:                   | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| d. Operating and structural equipment? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| e. Types of problems of equipment:     |  |
| 1. Malfunction                         | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| 2. Operator error                      | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| 3. Discharges                          | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |

6. Does the owner/operator maintain an inspection log? ☒ Yes ☐ No ☐ NA

- a. If yes, does it include:

- |   |   |
|---|---|
| 1. Date and time of inspection?                   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| 2. Name of inspector?                             | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| 3. Notation of observations?                      | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| 4. Date and nature of repairs or remedial action? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| 5. Identification of potential problems?          | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |

- b. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet.) ☐ Yes ☒ No ☐ NA

- c. Are records kept a minimum of three years? ☒ Yes ☐ No ☐ NA

Personnel Training (264.16) (265.16)

7. Does the owner/operator maintain personnel training records at the facility? ☐ Yes ☐ No ☐ NA

Date of most recent training: May 26, 1973

How long are they kept?

Indefinitely

a. If yes, do they include:

1. Job title and written job description of each position? ☒ Yes ☐ No ☐ NA
2. Description of type and amount of training? ☒ Yes ☐ No ☐ NA
3. Records of training given to facility personnel? ☒ Yes ☐ No ☐ NA

Requirements for Ignitable, Reactive, or Incompatible Waste  
(264.17) (265.17)

8. Does facility handle ignitable or reactive wastes? ☐ Yes ☒ No ☐ NA

a. If yes, is waste separated and confined from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat?

1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

b. Are smoking and open flames confined to specifically designated locations? ☐ Yes ☐ No ☒ NA

c. Are "No Smoking" signs posted in hazardous areas? ☐ Yes ☐ No ☒ NA

d. Are precautions documented (Part 264 only)? ☐ Yes ☐ No ☒ NA

9. Check containers

a. Are containers leaking or corroding? ☐ Yes ☒ No ☐ NA

b. Is there evidence of heat generation from incompatible wastes? ☐ Yes ☒ No ☐ NA

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion, or contamination of the environment? (264.31) (265.31) ☐ Yes ☒ No ☐ NA

If yes, use narrative explanation sheet to explain.



2. Is the facility equipped with: (264.32) (265.32)

a. Internal communication or alarm system? ☒ Yes ☐ No ☐ NA

1. Is it easily accessible in case of emergency? ☒ Yes ☐ No ☐ NA

b. Telephone or two-way radio to call emergency response personnel? ☒ Yes ☐ No ☐ NA

c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? ☒ Yes ☐ No ☐ NA

d. Water of adequate volume of hoses, sprinklers, or water spray system? ☒ Yes ☐ No ☐ NA

1. Describe source of water on site wells

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (264.35) (265.35) ☒ Yes ☐ No ☐ NA

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (264.37) (265.37) ☐ Yes ☒ No ☐ NA

5. In the case that more than one police or fire department might respond, is there a designated primary authority? (264.37) (265.37) ☐ Yes ☐ No ☒ NA

a. If yes, name primary authority Grenada Fire Dep

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers? (264.37) (265.37) ☒ Yes ☐ No ☐ NA

a. Are they really available to all personnel? ☐ Yes ☒ No ☐ NA

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (264.37) (265.37) ☐ Yes ☒ No ☐ NA

8. If State or local authorities declined to enter into agreements, is this entered in the operating record? (264.37) (265.37) ☐ Yes ☐ No ☒ NA

Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility? (264.53) (265.53) ☒ Yes ☐ No ☐ NA
- a. If yes, is it a revised SPCC Plan? ☒ Yes ☐ No ☐ NA
- b. Does contingency plan include: (264.52) (265.52)
- Civil Defense*  
*list of emergency organizations*
1. Arrangements with local emergency response organizations? ☐ Yes ☐ No ☐ NA
2. Emergency coordinator's names, phone numbers and addresses? ☒ Yes ☐ No ☐ NA
3. List of all emergency equipment at facility and descriptions of equipment? ☐ Yes ☐ No ☐ NA
4. Evacuation plan for facility personnel? ☐ Yes ☐ No ☐ NA
2. Is there an emergency coordinator on site or on call at all times? (264.55) (265.55) ☐ Yes ☐ No ☐ NA

Section D - Manifest System, Recordkeeping, and Reporting

1. Does facility receive waste from offsite? (264.71) (265.71) ☐ Yes ☒ No ☐ NA
- a. If yes, does the owner/operator retain copies of all manifests? ☐ Yes ☐ No ☒ NA
1. Are the manifests signed and dated and returned to the generator? ☐ Yes ☐ No ☒ NA
2. Is a signed copy given to the transporter? ☐ Yes ☐ No ☒ NA
2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? (264.71) (265.71) ☐ Yes ☒ No ☐ NA
- a. If yes, is it accompanied by a shipping paper? ☐ Yes ☐ No ☒ NA
1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? ☐ Yes ☐ No ☒ NA
2. Is a signed copy given to the transporter? ☐ Yes ☐ No ☒ NA
3. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? (264.72) (265.72) ☐ Yes ☒ No ☐ NA
- a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter? ☐ Yes ☐ No ☒ NA
1. If no, has Regional Administrator been notified? ☐ Yes ☐ No ☒ NA

4. Does the owner/operator keep a written operating record at the facility? (264.73) (265.73) ☐ Yes ☐ No ☐ NA

a. If yes, does it include:

1. Description and quantity of each hazardous waste received? ☐ Yes ☐ No ☒ NA
2. Methods and dates of treatment, storage, and disposal? ☐ Yes ☐ No ☒ NA
3. Location and quantity of each hazardous waste at each location? ☐ Yes ☐ No ☒ NA
4. Cross-references to manifests/shipping papers? ☐ Yes ☐ No ☒ NA
5. Records and results of waste analyses? ☐ Yes ☐ No ☒ NA
6. Report of incidents involving implementation of the contingency plan? ☐ Yes ☐ No ☒ NA
7. Records and results of required inspections? ☐ Yes ☐ No ☒ NA
8. Monitoring, testing, and analytical data, for groundwater required by Subpart F? ☐ Yes ☐ No ☒ NA
9. Closure cost estimates and, for disposal facilities, post-closure cost estimates (Part 264)? ☐ Yes ☐ No ☒ NA
10. Notices of generators as specified in Section 264.12(b) (Part 264)? ☐ Yes ☐ No ☒ NA

b. Does facility have copy of permit on site? ☐ Yes ☐ No ☒ NA

5. Does the facility submit a biennial report by March 1 every even-numbered year? (264.75) (265.75) ☒ Yes ☐ No ☐ NA

a. If yes, do reports contain the following information:

1. EPA I.D. number? ☒ Yes ☐ No ☐ NA
2. Date and year covered by report? ☒ Yes ☐ No ☐ NA
3. Description/quantity of hazardous waste? ☒ Yes ☐ No ☐ NA
4. Treatment, storage, and disposal methods? ☒ Yes ☐ No ☐ NA
5. Monitoring data under Section 265.94(a)(2) and (b)(2) (Part 265)? ☒ Yes ☐ No ☐ NA
6. Most recent closure and post-closure cost estimates? ☐ Yes ☐ No ☐ NA
7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year? ☒ Yes ☐ No ☐ NA
8. Certification signed by owner/operator? ☐ Yes ☐ No ☐ NA

6. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? (264.76) (265.76) ☐ Yes ☒ No ☐ NA

a. If yes, has he submitted an unmanifested waste report to the Executive Director? ☐ Yes ☐ No ☒ NA

7. Does the facility submit to the Executive Director reports on releases, fires, and explosions; contamination and monitoring data; and facility closure?

☒ Yes ☐ No ☐ NA

Part \_\_\_\_

LAND DISPOSAL RESTRICTIONS CHECKLIST

Section A - General

1. Are hazardous wastes land-disposed on site? ☐ Yes ☒ No ☐ NA
  - a. If yes, are one or more of the following circumstances true:
    1. Granted extension from effective date pursuant to Section 268.5? ☐ Yes ☐ No ☒ NA
    2. Granted exemption from a prohibition pursuant to a petition under Section 268.6? ☐ Yes ☐ No ☒ NA
    3. Disposing of soil or debris resulting from a CERCLA response action or a RCRA corrective action, which will not be prohibited until November 8, 1988? ☐ Yes ☐ No ☒ NA
    4. Facility is a small quantity generator of less than 100 kg of hazardous waste per month? ☐ Yes ☐ No ☒ NA
    5. Wastes not yet prohibited by Part 268? ☐ Yes ☐ No ☒ NA
2. Are restricted wastes or residuals from treatment of a restricted waste diluted in any way prior to disposal? ☐ Yes ☒ No ☐ NA
3. Are there active surface impoundments used for treatment of hazardous wastes? ☐ Yes ☒ No ☐ NA
  - a. If yes, does the unit's design and operation meet the requirements set forth in Section 268.4? ☐ Yes ☐ No ☒ NA
4. Has the facility sought exemption from any prohibition under Subpart C of Section 268 for the disposal of a restricted hazardous waste? ☐ Yes ☐ No ☒ NA
  - a. If yes, has the facility's demonstration included the required components (waste I.D., waste analysis, comprehensive environmental characterization of unit site, QA/QC plan, sampling, testing, modeling)? ☐ Yes ☐ No ☒ NA
5. Has the facility determined whether it generates a restricted waste through waste analysis? (268.7) ☒ Yes ☐ No ☐ NA
  - a. If yes, is the facility, in fact, handling a restricted waste(s)? ☒ Yes ☐ No ☐ NA
  - b. If yes, does the restricted waste required treatment? ☒ Yes ☐ No ☐ NA

- c. If yes, has the generator notified the treatment facility in writing, and does the notification include all required components (EPA hazardous waste number, corresponding treatment standard, manifest number of shipment)? ☒ Yes ☐ No ☐ NA
6. Does the facility handle EPA Hazardous Waste Nos. F001 through F005 (solvent wastes)? (268.10) ☒ Yes ☐ No ☐ NA
- a. If yes, do any of the following conditions apply:
1. The generator of the solvent waste is a small quantity generator (not more than 1000 kg/month)? ☐ Yes ☒ No ☐ NA
  2. The solvent waste is generated from a CERCLA response corrective action? ☐ Yes ☒ No ☐ NA
  3. The solvent waste is a solvent-water mixture, solvent-containing sludge, or solvent-contaminated soil (non-CERCLA or RCRA corrective action) containing less than 1 percent total F001 through F005 solvent constituents. ☐ Yes ☒ No ☐ NA
- b. If no, have any of these restricted wastes began land-disposed (except in an injection well) since November 8, 1986? ☐ Yes ☒ No ☐ NA
7. Does the facility handle EPA Hazardous Waste Nos. F020, F021, F023, F026, F027, or F028 (dioxin-containing wastes)? ☐ Yes ☒ No ☐ NA
- a. If yes, do any of the following conditions apply:
1. Wastes are treated to meet standards of Subpart D of Section 268? ☐ Yes ☐ No ☒ NA
  2. Wastes are disposed of at a facility that has been granted a petition? ☐ Yes ☐ No ☒ NA
  3. An extension has been granted? ☐ Yes ☐ No ☒ NA
- b. If no, were these restricted wastes land disposed after November 8, 1988? ☐ Yes ☐ No ☒ NA
8. Are restricted wastes being treated? ☐ Yes ☐ No ☒ NA
- a. If yes, have any of their associated hazardous constituents exceeded the "Constituent in Waste Extract" (CWE) levels? ☐ Yes ☐ No ☒ NA

Section B - Generator Compliance

1. Waste Identification

a. Does the generator handle the following wastes:

1. Solvent wastes

- (i) F001, F002, F004, or F005  
(ii) F003

*This waste was replaced by a non-hazardous waste.*  
☐ Yes ☒ No ☐ NA  
☐ Yes ☒ No ☐ NA

If an F003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?

☐ Yes ☐ No ☒ NA

Note: Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially misclassified F-solvents, Appendix A-2 presents a list of corresponding F and U wastes.

2. Dioxin wastes (F020-F023, F026-F028)

☐ Yes ☒ No ☐ NA

3. Potential California List Wastes  
(see Appendix C)

☐ Yes ☐ No ☐ NA

(i) D002

☐ Yes ☒ No ☐ NA

(ii) D004-D011

☒ Yes ☐ No ☐ NA

(iii) Any other waste characterized by high concentrations of halogenated organic constituents (HOCs), metals, or cyanides?

☐ Yes ☒ No ☐ NA

(iv) Any F, K, P, or U wastes subject to "soft hammer" requirements that may qualify as California wastes due to HOCs, metals, or cyanide content?  
(See Appendix F)

☐ Yes ☒ No ☐ NA

4. First Third Wastes (See MHWMR 268.10)

☒ Yes ☐ No ☐ NA

5. Second Third Wastes (See MHWMR 268.11)

☐ Yes ☒ No ☐ NA

6. (Reserved)

- (i) Are any of the above "soft hammer" wastes? (See Appendices D & E)

☐ Yes ☐ No ☐ NA

2. BDAT Treatability Group - Treatment Standards Identification

a. Does the generator mix restricted wastes with different treatment standards for constituents of concern?

☐ Yes ☒ No ☐ NA

- b. If yes, did the generator select the most stringent treatment standard for the constituent of concern [Section 268.41(b)]?

☒ Yes ☐ No ☐ NA

c. F Solvents

Did the generator correctly determine the appropriate treatability group [Section 268.41] of the waste (e.g., wastewaters containing solvents, nonwastewater (i.e., < 1% TOC), pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

☒ Yes ☐ No ☐ NA

d. California Wastes

Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg [Section 268.32(a)(3)]?

☒ Yes ☐ No ☐ NA

e. First and Second Third Waste

1. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) [Section 268.7(a)]?

☒ Yes ☐ No ☐ NA

2. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)?

☐ Yes ☒ No ☐ NA

3. Waste Analysis

- a. Did the generator determine whether the waste exceeds treatment standards based on Section 268.7(a):

1. Knowledge of wastes

☒ Yes ☐ No ☐ NA

- (i) List wastes for which "applied knowledge" was used:

FOOD - discontinued use



2. TCLP

☒ Yes ☐ No ☐ NA

(i) List wastes for which "TCLP" was used:

DOB

(ii) MHWMR 268.41 lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP?

☐ Yes ☒ No ☐ NA

If yes, list: \_\_\_\_\_

3. Total waste analysis

☐ Yes ☒ No ☐ NA

4. If files were retained, describe content and basis of applied knowledge determination:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: \_\_\_\_\_

Note which wastes were subjected to which tests:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) \_\_\_\_\_

5. Were wastes tested using TCLP or total constituent analysis when a process or wastestream changed [Section 264.13(a)(3)(i) or Section 265.13(a)(3)(i)]?

☐ Yes ☐ No ☒ NA

b. Did the restricted wastes exceed applicable treatability group treatment standards upon generation [Section 268.7(a)(1)]?

List those that exceeded standards: \_\_\_\_\_  
\_\_\_\_\_

List those that did not exceed standards: \_\_\_\_\_

- c. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [Section 268.3] ☐ Yes ☐ No ☐ NA

6. Has the generator conducted any testing of those hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California wastes? ☐ Yes ☐ No ☐ NA

If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste? ☐ Yes ☐ No ☐ NA

4. Management

a. Onsite management

1. Were restricted wastes managed onsite? ☐ Yes ☒ No ☐ NA

2. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted? ☐ Yes ☒ No ☐ NA

If yes, TSDf checklist must be completed.

b. Offsite Management

1. If restricted wastes exceed treatment standards, did generator provide treatment facility notification with each shipment? [268.7(a)(1)]:

- |  |   |                             |                             |
|--|---|-----------------------------|-----------------------------|
| (i) EPA Hazardous Waste Number?        | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| (ii) Corresponding treatment standard? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| (iii) Manifest number?                 | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| (iv) Waste analysis, if available?     | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |

Identify offsite treatment facilities \_\_\_\_\_

2. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:

- |  |                              |  |  |
|--|------------------------------|--|--|
| (i) EPA hazardous waste I.D. number?   | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> NA            |
| (ii) Corresponding treatment standard? | <input type="checkbox"/> Yes | <input type="checkbox"/> No            | <input checked="" type="checkbox"/> NA |

(iii) Manifest number

\_\_\_ Yes \_\_\_ No X NA

(iv) Certification regarding waste and that  
it meets treatment standards?

\_\_\_ Yes \_\_\_ No X NA

Identify land disposal facilities receiving the  
BDAT certified wastes \_\_\_\_\_

3. If the generator's waste is subject to a  
Section 268.5 case by case exemption, a  
Section 268.6 "no migration" exemption,  
or a nationwide variance does the generator's  
records indicate that he or she submits with  
each waste shipment [Section 268.7(a)(3)]:

(i) EPA Hazardous Waste Number?

\_\_\_ Yes \_\_\_ No \_\_\_ NA

(ii) Corresponding Treatment Standards?

\_\_\_ Yes \_\_\_ No \_\_\_ NA

(iii) All applicable prohibitions?

\_\_\_ Yes \_\_\_ No \_\_\_ NA

(iv) The manifest number?

\_\_\_ Yes \_\_\_ No \_\_\_ NA

(v) The date the wastes are subject to  
prohibitions?

\_\_\_ Yes \_\_\_ No \_\_\_ NA

(vi) Does generator keep records of all  
notifications/certifications send to  
offsite facilities?

\_\_\_ Yes \_\_\_ No \_\_\_ NA

List all prohibited wastes for which records  
are not provided per above [Section 268.7(a)(b)]:  
\_\_\_\_\_  
\_\_\_\_\_

Identify TSDFs receiving any prohibited wastes  
subject to any exemptions and variances:  
\_\_\_\_\_  
\_\_\_\_\_

4. If handler generates a "soft hammer" waste, does  
the generator send with each "soft hammer" waste  
shipment to a TSDF and retain copies of, a notice  
that includes [268.7(a)(4)]:

The EPA Hazardous Waste Number?

\_\_\_ Yes \_\_\_ No \_\_\_ NA

Applicable prohibitions?

\_\_\_ Yes \_\_\_ No \_\_\_ NA

The manifest number?

\_\_\_ Yes \_\_\_ No \_\_\_ NA

Waste analysis data, where available?

\_\_\_ Yes \_\_\_ No \_\_\_ NA

(i) Do the generator's records indicate that  
any soft-hammer wastes are destined for  
disposed in a landfill or surface  
impoundment [Section 268.33(f)]?

\_\_\_ Yes \_\_\_ No \_\_\_ NA

If yes, list facility of destination and waste of concern [Section 268.8(a)(2)]

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- (ii) Has the generator submitted demonstrations and certifications for each "soft-hammered" waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of waste to the TSDF [Section 268.7(a)(2)]? ☐ Yes ☐ No ☒ NA
- (iii) Has the generator retained a copy of the demonstration on site [Section 268.8(a)(3)-(a)(4)]? ☐ Yes ☐ No ☒ NA
- (iv) Has the generator retained copies of all Section 268.8 certifications sent to the TSDF [Section 268.7(a)(6)] ☐ Yes ☐ No ☒ NA
- (v) Did the generator submit the demonstration to the receiving facility upon the initial shipment of the waste [Section 268.8(a)(3)-(a)(4)]? ☐ Yes ☐ No ☒ NA
- (vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [Section 268.8(b)(3)]? ☐ Yes ☐ No ☒ NA

5. Storage of Prohibited Waste

- a. Were prohibited wastes stored for greater than 90 days? ☐ Yes ☒ No ☐ NA

If yes, was facility operating as a TSD under interim status or final permit [Section 262.34(b)]?

☐ Yes ☐ No ☒ NA

If yes, TSDF Checklist must be completed.

6. Treatment Using RCRA 264/265 Exempt Units or Processes  
(i.e, boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes?

☐ Yes ☐ No ☒ NA

If yes, list type of treatment unit and processes

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If yes, TSDF checklist must be completed.

Section C - Treatment, Storage & Disposal Requirements

N/A

1. General

a. Does the facility conduct waste analysis (total and TCLP) on-site or through a commercial laboratory?

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b. Describe the frequency of sampling conducted by the facility.

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2. Treatment Facilities

a. Has the treatment facility revised its waste analysis plan [Section 268.7(b)] to meet the requirements of Section 264.13 or 265.13?

\_\_\_ Yes \_\_\_ No \_\_\_ NA

(i) Is the treatment facility conducting TCLP tests for wastes subject to treatment standards expressed as waste extracts per 268.7(b)(i)?

\_\_\_ Yes \_\_\_ No \_\_\_ NA

(ii) Is the treatment facility using the paint filter test for the California waste residues [Section 268.7(b)(ii)]?

\_\_\_ Yes \_\_\_ No \_\_\_ NA

(iii) Is the treatment facility testing the pH of California waste residues?

\_\_\_ Yes \_\_\_ No \_\_\_ NA

(iv) Is the treatment facility testing concentrations (not extracts) in the waste residues for prohibited wastes with established treatment standards expressed as waste concentrations [Section 268.7(b)(3)]?

\_\_\_ Yes \_\_\_ No \_\_\_ NA

(v) Is the treatment facility testing extracts of the waste residues for prohibited wastes having established treatment standards expressed as extract concentrations [Section 268.7(b)(1)]

\_\_\_ Yes \_\_\_ No \_\_\_ NA

3. Land Disposal Facilities

- a. Has the facility retained all notices and certifications from generators, storage and treatment facilities [268.7(c)(1)]? ☐ Yes ☐ No ☐ NA
- b. Are wastes and waste residues tested for compliance with applicable treatment standards and prohibitions [Section 268.7(c)(2)]? ☐ Yes ☐ No ☐ NA
- c. Are they being tested in conformance with the frequency specified in the waste analysis plan [Section 268.7(c)(3)]? ☐ Yes ☐ No ☐ NA
- d. Are the appropriate tests (TCLP vs. total waste) being used [Section 268.7(c)(2)]? ☐ Yes ☐ No ☐ NA

4. Storage (Section 268.50)

- a. Are restricted wastes exceeding treatment standards stored (excepting wastes subject to no migration exemptions, nationwide variances, case by case extensions, soft-hammered wastes)? ☐ Yes ☐ No ☐ NA
- b. Are all containers clearly marked to identify content and date(s) entering storage [Section 268.50(a)(2)]? ☐ Yes ☐ No ☐ NA
- c. Do operating records track the location, quantity and dates that wastes exceeding treatment standards entered and were removed from storage [Section 264.73 or Section 265.73]? ☐ Yes ☐ No ☐ NA
- d. Do operating records agree with container labeling? [Section 268.50(a)(2) or Section 264.73 or Section 265.73] ☐ Yes ☐ No ☐ NA
- e. Is waste exceeding treatment standards stored for less than 1 year? ☐ Yes ☐ No ☐ NA
- If yes, can you show that such accumulation is not necessary to facilitate proper recovery, treatment, or disposal? ☐ Yes ☐ No ☐ NA
- If yes, state how: \_\_\_\_\_
- f. Was/is waste exceeding treatment standards stored for more than one year? ☐ Yes ☐ No ☐ NA

If yes, state the owner/operator's proof that such storage was solely for the purposes of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal:

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5. Treatment in Surface Impoundments (Section 268.4)

- |  |                              |                             |                             |
|--|------------------------------|-----------------------------|-----------------------------|
| a. Are prohibited wastes placed in surface impoundments for treatment?   | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| b. Is the only recognizable "treatment" occurring in the impoundment either evaporation, dilution, or both [Section 268.4(b) and Section 268.3]?   | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| c. Did the facility submit a certification of compliance with minimum technology and groundwater monitoring requirements, and the waste analysis plan to the Agency [Section 268.4(a)(4)]?   | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| d. Have the minimum technology requirements been met [Section 268.4(a)(4)]?  | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 1. If the minimum technology requirements have not been met, has a waiver been granted for that unit(s) [Section 268.4(a)(3)(iii)]?  | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| e. Have the Subpart F groundwater monitoring requirements been met [Section 268.4(a)(3)]?  | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| f. Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan and are the results in the operating record for all wastes with treatment standards or prohibition levels [Section 268.4(a)(2)]? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| g. Did the hazardous waste residue (sludge or liquid) exceed the treatment standards or prohibition levels?  | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| h. Provide the frequency of analyses conducted on treatment residues: _____  |                              |                             |                             |
| <hr/>  |                              |                             |                             |
| Does the frequency meet the requirements of the waste analysis plan [Section 264.13 or Section 265.13]?  | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |

- i. Does the operating record adequately document the results of waste analyses performed [Section 264.13 or Section 265.13]? ☐ Yes ☐ No ☐ NA
- j. Have the hazardous waste residues that exceed the treatment standards and/or prohibition levels been removed adequately and on an annual basis [Section 268.4(a)(2)(ii)]? ☐ Yes ☐ No ☐ NA
1. If answer to f is no and supernatant is determined to exceed treatment concentrations, is annual throughput greater than impoundment volume? (note: sludge exceeding treatment standards must be removed) ☐ Yes ☐ No ☐ NA
- k. If residues were removed annually, were adequate precautions taken to protect liners and do records indicate that inspections of liner integrity are performed? ☐ Yes ☐ No ☐ NA
- l. When removed, were residues of restricted wastes managed subsequently in another surface impoundment? ☐ Yes ☐ No ☐ NA
1. Were these residues subject to a valid 268.8 certification? ☐ Yes ☐ No ☐ NA
- m. When removed, were wastes treated prior to disposal? ☐ Yes ☐ No ☐ NA
1. If yes, are waste residues treated on or offsite? ☐ Yes ☐ No ☐ NA
2. Identify management method: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. Other Treatment

- a. Does the facility operate treatment units (regulated or exempt) (not including surface impoundments)? ☐ Yes ☐ No ☐ NA
- b. Describe the treatment processes, including exempt processes: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- c. Does the facility treat soft-hammered wastes? ☐ Yes ☐ No ☐ NA



1. If yes, is treatment occurring as described in the generator's certification/demonstration [Section 268.8(c)(1)]? \_\_ Yes \_\_ No NA
  2. Did the treatment facility certify he treated the soft-hammered waste as per the generator's demonstration and maintain copies of all certifications [268.8(c)(1)]? \_\_ Yes \_\_ No NA
  3. Did the treatment facility send a copy of the generator's demonstration and certification to the receiving treatment, recovery, or storage facility [Section 268.8(c)(2)]? \_\_ Yes \_\_ No NA
  - d. Does the facility, in accordance with an acceptable waste analysis plan, verify that the residue extract from all treatment processes for the restricted wastes are less than treatment standards or prohibition levels [Section 268.7(c)(2)]? \_\_ Yes \_\_ No NA
  - e. Describe frequency of testing of treatment residuals.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
  - f. Was dilution used as a substitute for treatment [Section 268.3]? \_\_ Yes \_\_ No NA
  - g. Are all notifications, certifications, and results of waste analyses kept in the operating record [Section 264.73(b) or Section 265.73(b)]? \_\_ Yes \_\_ No NA
  - h. Are notices provided to land disposal facilities complete with Waste Number, treatment standard, manifest number, and analytical data (where available) submitted for each shipment of waste or treatment residual that meets the treatment standard stating that waste has been treated to treatment performance standards [Section 268.7(b)(4) and (5) and Section 268.8(c)(1)]? \_\_ Yes \_\_ No NA
  - i. If the waste or treatment residue will be further managed at another storage or treatment facility, has the treatment facility complied with the 268.7(a) notification and certification requirements applicable to generators [Section 268.7(b)(6)]? \_\_ Yes \_\_ No NA
7. Land Disposal
- a. Are restricted and/or prohibited wastes placed in land disposal units (landfills, surface impoundments\*

- waste piles, wells, land treatment units, salt domes/beds, mines/caves, concrete vault or bunker?) ☐ Yes ☐ No ☐ NA
- b. Did facility have the notice and certification from generators/treaters in its operating record that all prohibited wastes disposed met standards for generation or treatment [Section 268.7(c)(1) and 268.7(a),(b)]? ☐ Yes ☐ No ☐ NA
- c. Did the facility obtain waste analysis data through testing of the waste to determine that the wastes are in compliance with the applicable treatment standards [Section 268.7(c)(2)]? ☐ Yes ☐ No ☐ NA
- If yes, was the frequency of testing as required by the facility's waste analysis plan [Section 264.13 or 265.13]? ☐ Yes ☐ No ☐ NA
- d. Were prohibited wastes exceeding the applicable treatment standards or prohibition levels placed in land disposal units [268.30] excluding national capacity variances [268.30(a)]? ☐ Yes ☐ No ☐ NA
- If yes, did facility have an approved waiver based on no migration petition [268.6] or approved case-by-case or capacity extension [268.5] or treatment standard variance [268.44][Section 268.30(d), Section 268.31(d), Section 268.32(g), Section 268.33(e)]? ☐ Yes ☐ No ☐ NA
- e. Were restricted wastes subject to a national capacity variance or case-by-case extension disposed? ☐ Yes ☐ No ☐ NA
- If yes, have the minimum technology requirements been met for all units receiving such wastes [Section 268.30(c), 268.31(c), 268.32(d), 268.33(d)]? ☐ Yes ☐ No ☐ NA
- f. Were adequate records of disposal maintained [Section 264.73(b) or 265.73(b)]? ☐ Yes ☐ No ☐ NA
- g. If wastes subject to a nationwide variances, case-by-case extensions [268.5], or no migration petitions [268.6] were disposed, does facility have generator's notices [268.7(a)(3)] and records of disposal? [Section 264.73(b) or Section 265.73(b)] ☐ Yes ☐ No ☐ NA
- h. If the facility has a case-by-case extension, can the inspector verify that the facility is making progress as described in progress reports? ☐ Yes ☐ No ☐ NA

i. If the owner/operator is disposing of a soft-hammer waste, is he maintaining the generators and treaters (if applicable) notices and certifications [Section 268.8(a)(2)-(a)(4)]?

☐ Yes ☐ No ☐ NA

1. Is the facility disposing of any soft hammer wastes that may be classified as California wastes?

☐ Yes ☐ No ☐ NA

2. Did the facility seek to verify whether these wastes may be subject to all restrictions, e.g., California ban?

☐ Yes ☐ No ☐ NA

Part \_\_\_\_\_

GENERATOR'S CHECKLIST

Section A - EPA Identification No.

1. Does generator have EPA I.D. No.? (262.12) ☒ Yes \_\_\_ No \_\_\_ NA
- a. If yes, EPA I.D. No. 00 7 63 7 2 7 8

Section B - Manifest

1. Does generator ship waste offsite? (262.20) ☒ Yes \_\_\_ No \_\_\_ NA
- a. If no, do not fill out Sections B and D.
- b. If yes, identify primary offsite facility(s).  
Land law
2. Does generator use manifest? (262.20) ☒ Yes \_\_\_ No \_\_\_ NA
- a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month)? \_\_\_ Yes \_\_\_ No ☒ NA
1. If yes, does generator indicate this when sending waste to a TSD facility? \_\_\_ Yes \_\_\_ No ☒ NA
- b. If yes, does manifest include the following information? ☒ Yes \_\_\_ No \_\_\_ NA
1. Manifest document No. ☒ Yes \_\_\_ No \_\_\_ NA
2. Generator's name, mailing address, telephone number ☒ Yes \_\_\_ No \_\_\_ NA
3. Generator EPA I.D. No. ☒ Yes \_\_\_ No \_\_\_ NA
4. Transporter Name(s) and EPA I.D. No.(s) ☒ Yes \_\_\_ No \_\_\_ NA
5. a. Facility name, address, and EPA I.D. No. ☒ Yes \_\_\_ No \_\_\_ NA
- b. Alternate facility name, address, and EPA I.D. No. ☒ Yes \_\_\_ No \_\_\_ NA
- c. Instructions to return to generator if undeliverable ☒ Yes \_\_\_ No \_\_\_ NA
6. Waste information required by DOE - shipping name, quantity (weight or vol.), containers (type and number) ☒ Yes \_\_\_ No \_\_\_ NA
7. Emergency information (optional) (special handling instructions, telephone No.) ☒ Yes \_\_\_ No \_\_\_ NA
8. Is the following certification on each manifest form? ☒ Yes \_\_\_ No \_\_\_ NA

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

9. Does generator retain copies of manifests? ☒ Yes ☐ No ☐ NA

If yes, complete a through e.

- a. 1. Did generator sign and date all manifests? ☒ Yes ☐ No ☐ NA  
2. Who signed for generator? ☐ Yes ☐ No ☐ NA

Name Rhonda York Title Plant Chemist

- b. 1. Did generator obtain handwritten signature and date of acceptance from initial transporter? ☒ Yes ☐ No ☐ NA  
2. Who signed and dated for transporter? ☐ Yes ☐ No ☐ NA

Name Various Title \_\_\_\_\_

- c. Does generator retain one copy of manifest signed by generator and transporter? ☒ Yes ☐ No ☐ NA  
d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? ☒ Yes ☐ No ☐ NA  
e. Does generator retain copies for 3 years? ☒ Yes ☐ No ☐ NA

#### Section C - Hazardous Waste Determination

1. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? (261.30) ☒ Yes ☐ No ☐ NA

a. If yes, list waste and quantities (include EPA Hazardous Waste No.) D007

2. Does generator solid waste(s) listed in Subpart C that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) (261.20) ☒ Yes ☐ No ☐ NA

a. If yes, list wastes and quantities (include EPA Hazardous Waste No.) D007

- b. Does generator determine characteristics by testing or by applying knowledge of processes? Both

1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? ☐ Yes ☐ No ☐ NA

a. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes generated by generators?

☒ Yes ☐ No ☐ NA

- a. If yes, did generator test all wastes to determine nonhazardous characteristics?

☒ Yes ☐ No ☐ NA

1. If no, list wastes and quantities deemed nonhazardous or processes from which nonhazardous waste was produced (use additional sheet if necessary).

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Section D - Pretransport Requirements

1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30)

☒ Yes ☐ No ☐ NA

2. a. Are containers to be shipped leaking or corroding?  
b. Use sheet to describe containers and condition.  
c. Is there evidence of heat generation from incompatible wastes in the containers? (262.31)

☐ Yes ☒ No ☐ NA

☐ Yes ☒ No ☐ NA

3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172?

☒ Yes ☐ No ☐ NA

4. Does generator mark each package in accordance with 49 CFR 172?

☒ Yes ☐ No ☐ NA

5. Is each container of 110 gallons or less marked with the following label? (262.32)

☒ Yes ☐ No ☐ NA

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest policy or public safety authority or the U.S. Environmental Protection Agency.

Generator name(s) and address(es) \_\_\_\_\_

Manifest document No. \_\_\_\_\_

6. Does generator have placards to offer to transporters? (262.33)

☐ Yes ☐ No ☐ NA

7. Accumulation time: (262.34)

- a. Are containers used to temporarily store waste before transport? ☒ Yes ☐ No ☒ NA
1. If yes, is each container clearly dated:  
Also, fill out rest of No. 7 (accum. time) ☐ Yes ☐ No ☒ NA
- b. 1. Does generator inspect containers for leakage or corrosion? (265.174 - Inspections) ☒ Yes ☐ No ☐ NA
2. If yes, with what frequency? daily ☐ Yes ☐ No ☐ NA
- c. Does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line? (265.176 - Special Requirements for Ignitable or Reactive Wastes) ☒ Yes ☐ No ☐ NA

NOTE: If tanks are used, fill out checklist for tanks.

- d. Are the containers labeled and marked in accordance with Section D-3, D-4, and D-5 of this form? ☒ Yes ☐ No ☐ NA

NOTE: If generator accumulates waste on site, fill out checklist for General Facilities, Subparts C and D.

- e. Does generator comply with requirements for personnel training? (Attach checklist for 265.16 - Personnel Training.) ☒ Yes ☐ No ☐ NA

8. Describe storage area. Use photos and narrative explanation sheet.

Section E - Recordkeeping and Records (262.40)

1. Does generator keep the following reports for 3 years?

- a. Manifests and signed copies from ☒ Yes ☐ No ☐ NA
- b. Biennial Reports ☒ Yes ☐ No ☐ NA
- c. Exception reports ☒ Yes ☐ No ☐ NA
- d. Test results ☒ Yes ☐ No ☐ NA

2. Where are the records kept (at facility or elsewhere)?

Facility

3. Who is in charge of keeping the records?

Name Rhonda J. Smith Title Plant Manager

Section F - Special Conditions

1. Has generator received from or transported to a foreign Administrator? ☐ Yes ☒ No ☐ NA
- a. If yes, has he filed a notice with the Regional Administrator? ☐ Yes ☐ No ☒ NA
- b. Is this waste manifested and signed by a foreign cosignee? ☐ Yes ☐ No ☒ NA
- c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? ☐ Yes ☐ No ☒ NA



Appendix II - Less-than-Ninety Day Storage

1. Source/Data: Para 1 Boats
2. Type(s) of waste: D007 Radio Alloys
3. Condition of containers: Good

- a. Containers closed?
- b. Containers properly labelled?
- c. Accumulation dates?
- d. Area inspected?

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

Appendix II - Less-than-Ninety Day Storage

1. Source/Data: Pack 14
2. Type(s) of waste: Doo 1
3. Condition of containers: waste toluene

- a. Containers closed?
- b. Containers properly labelled?
- c. Accumulation dates?
- d. Area inspected?

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

Appendix II - Less-than-Ninety Day Storage

1. Source/Data: \_\_\_\_\_

2. Type(s) of waste: DBO1 WASTE BRATTING

3. Condition of containers: Good

a. Containers closed?

☒ Yes ☐ No ☐ NA

b. Containers properly labelled?

☒ Yes ☐ No ☐ NA

c. Accumulation dates?

☒ Yes ☐ No ☐ NA

d. Area inspected?

☒ Yes ☐ No ☐ NA

Appendix II - Less-than-Ninety Day Storage

1. Source/Data: Chrome Electroplating
2. Type(s) of waste: D007 Chrome Sludge
3. Condition of containers: Good

- a. Containers closed?
- b. Containers properly labelled?
- c. Accumulation dates?
- d. Area inspected?

<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA

Waste Information Worksheet  
(To be filled out for each hazardous waste)

Waste Name: Methylene Chloride & O.I.  
Waste Code: F002, D007, D008

Process Generating Waste: Stripping Racks

How was determination made?

Knowledge of Waste. Describe. \_\_\_\_\_  
☒ Testing. Describe. \_\_\_\_\_

Waste Generation Rate (may be estimated) \_\_\_\_\_

Disposal Procedure: Offsite

Site/Firm: Bryson Services Memphis

Is waste subject to requirements of MHWMR 268? Yes\_\_ No\_\_  
Describe. \_\_\_\_\_

Is waste excluded under MHWMR 261.4? Yes\_\_ No\_\_  
Describe. \_\_\_\_\_

Waste Information Worksheet  
(To be filled out for each hazardous waste)

Waste Name: \_\_\_\_\_  
Waste Code: \_\_\_\_\_

Process Generating Waste: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

How was determination made?  
\_\_\_\_ Knowledge of Waste. Describe. \_\_\_\_\_  
\_\_\_\_ Testing. Describe. \_\_\_\_\_

Waste Generation Rate (may be estimated) \_\_\_\_\_

Disposal Procedure: \_\_\_\_\_  
\_\_\_\_\_

Site/Firm: \_\_\_\_\_

Is waste subject to requirements of MHWMR 268? Yes\_\_ No\_\_  
Describe. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Is waste excluded under MHWMR 261.4? Yes\_\_ No\_\_  
Describe. \_\_\_\_\_  
\_\_\_\_\_

Waste Information Worksheet  
(To be filled out for each hazardous waste)

Waste Name: Paint Booth Filters  
Waste Code: D007

Process Generating Waste: Painting operation

How was determination made?

☐ Knowledge of Waste. Describe. TC  
☒ Testing. Describe. \_\_\_\_\_

Waste Generation Rate (may be estimated) \_\_\_\_\_

Disposal Procedure: Offsite Disposal

Site/Firm: Bryson Services

Is waste subject to requirements of MHWMR 268? Yes\_\_ No\_\_  
Describe. \_\_\_\_\_

Is waste excluded under MHWMR 261.4? Yes\_\_ No\_\_  
Describe. \_\_\_\_\_

Waste Information Worksheet  
(To be filled out for each hazardous waste)

Waste Name: Chrome Rinse Waters  
Waste Code: D007

Process Generating Waste: Chrome Plating

How was determination made?

☐ Knowledge of Waste. Describe. \_\_\_\_\_  
☒ Testing. Describe. \_\_\_\_\_

Waste Generation Rate (may be estimated) \_\_\_\_\_

Disposal Procedure: NPDES

Site/Firm: \_\_\_\_\_

Is waste subject to requirements of MHWMR 268? Yes\_\_ No\_\_  
Describe. \_\_\_\_\_  
\_\_\_\_\_

Is waste excluded under MHWMR 261.4? Yes\_\_ No\_\_  
Describe. \_\_\_\_\_  
\_\_\_\_\_



Waste Information Worksheet  
(To be filled out for each hazardous waste)

Waste Name: Chromic Sludge  
Waste Code: D007

Process Generating Waste: Cleanout of Tanks  
Chromic Acid Tanks

How was determination made?  
☐ Knowledge of Waste. Describe. \_\_\_\_\_  
☒ Testing. Describe. \_\_\_\_\_

Waste Generation Rate (may be estimated) \_\_\_\_\_

Disposal Procedure: Off site Disposal

Site/Firm: Brycon Recovery Services Memphis

Is waste subject to requirements of MHWMR 268? Yes ☒ No ☐  
Describe. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Is waste excluded under MHWMR 261.4? Yes ☐ No ☐  
Describe. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Waste Information Worksheet  
(To be filled out for each hazardous waste)

Waste Name: Waste TCE  
Waste Code: F002 D010 D039

Process Generating Waste: Paint Booth cleaning operation

How was determination made?  
☒ Knowledge of Waste. Describe. \_\_\_\_\_  
☐ Testing. Describe. \_\_\_\_\_

Waste Generation Rate (may be estimated) \_\_\_\_\_

Disposal Procedure: Off site

Site/Firm: Bryson Services Memphis

Is waste subject to requirements of MHWMR 268? Yes\_\_ No\_\_  
Describe. \_\_\_\_\_

Is waste excluded under MHWMR 261.4? Yes\_\_ No\_\_  
Describe. \_\_\_\_\_

Waste Information Worksheet  
(To be filled out for each hazardous waste)

Waste Name: WASTE PETROLEUM MATERIAL  
Waste Code: D001 D039

Process Generating Waste: Parts Washer

How was determination made?  
☒ Knowledge of Waste. Describe. \_\_\_\_\_  
☐ Testing. Describe. \_\_\_\_\_

Waste Generation Rate (may be estimated) \_\_\_\_\_

Disposal Procedure: SARTON KLEEN

Site/Firm: Sarthaven

Is waste subject to requirements of MHWMR 268? Yes ☒ No ☐  
Describe. \_\_\_\_\_

Is waste excluded under MHWMR 261.4? Yes ☐ No ☒  
Describe. \_\_\_\_\_

Part \_\_\_\_\_

FINANCIAL REQUIREMENTS CHECKLIST

Section A - Closure

1. Is facility required to provide financial assurance for closure? ✓ Yes    No    NA
- a. Type of financial assurance Financial Test
- b. Amount of closure costs 1,291,249
1. Date of most recent adjustment March 30, 1993
- c. Effective date of mechanism April 1, 1993
- d. Expiration date of mechanism March 30, 1994
- e. Is instrument adequate? ✓ Yes    No    NA

Section B - Post-Closure

1. Is facility required to provide financial assurance for post-closure care?    Yes X No    NA
- a. Type of financial assurance NONE
- b. Amount of closure costs
1. Date of most recent adjustment
- c. Effective date of mechanism
- d. Expiration date of mechanism
- e. Is instrument adequate?    Yes    No    NA

Section C - Corrective Action

1. Is facility required to provide financial assurance for corrective action?    Yes X No    NA
- a. Type of financial assurance None
- b. Amount of closure costs
1. Date of most recent adjustment
- c. Effective date of mechanism
- d. Expiration date of mechanism
- e. Is instrument adequate?    Yes    No    NA

Section D - Liability Requirements

1. Is facility required to provide liability coverage for sudden accidental occurrences?    Yes    No    NA
- a. Type of assurance
- b. Is amount at least \$1 million per occurrence, \$2 million annual aggregate?    Yes    No    NA
- c. Effective date of mechanism

d. Expiration date of mechanism \_\_\_\_\_

2. Is facility required to provide liability coverage  
for non-sudden accidental occurrences?

\_\_Yes \_\_No \_\_NA

a. Type of assurance \_\_\_\_\_

- b. Is amount at least \$3 million per occurrence, \$6  
million annual aggregate?

\_\_Yes \_\_No \_\_NA

c. Effective date of mechanism \_\_\_\_\_

d. Expiration date of mechanism \_\_\_\_\_

CHCKLIST:lr